

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

AUTOMATED TRACKING)	
SOLUTIONS, LLC,)	
)	
Plaintiff,)	
v.)	
)	Case No. 1:15-cv-4348-WD
THE COCA-COLA COMPANY,)	
)	
Defendant.)	

**DEFENDANT THE COCA-COLA COMPANY'S
MOTION FOR JUDGMENT ON THE PLEADINGS**

Pursuant to Federal Rule of Civil Procedure 12(c), Defendant The Coca-Cola Company ("Coca-Cola") hereby submits this Motion for Judgment on the Pleadings. The pleadings in this case demonstrate that the asserted claims of U.S. Patent Nos. 7,551,089 ("the '089 Patent"), 7,834,766 ("the '766 Patent"), 8,842,013 ("the '013 Patent"), and 8,896,449 ("the '449 Patent") (collectively, "patents-in-suit") are directed to an abstract idea that is implemented by well-known, conventional computer technology. Accordingly, Coca-Cola moves the Court for judgment on the pleadings that the asserted claims of the patents-in-suit are invalid under 35 U.S.C. § 101 because they are directed to unpatentable subject matter.

The grounds in support of Coca-Cola's Motion are set forth in more detail in the Defendant The Coca-Cola Company's Memorandum of Law in Support of its Motion for Judgment on the Pleadings, which is attached to this Motion, along with a Proposed Order.

Submitted this 29th day of April, 2016.

By: /s/ Shane Nichols
A. Shane Nichols
Ga. Bar No. 524654
Siraj M. Abhyankar
Ga. Bar No. 484680
shri.abhyankar@alston.com
ALSTON & BIRD LLP
One Atlantic Center
1201 West Peachtree Street
Atlanta, GA 30309-3424
Telephone: 404-881-7000
Fax: 404-881-7777
Email: shane.nichols@alston.com
Email: shri.abhyankar@alston.com

**Counsel for Defendant
THE COCA-COLA COMPANY**

CERTIFICATE OF SERVICE

I hereby certify that on April 29, 2016, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF which will send electronic notification of such filing to all counsel of record.

/s/ Shane Nichols

A. Shane Nichols

CERTIFICATE OF COMPLIANCE WITH LR 5.1

I hereby certify that the foregoing document is written in 14 point Times New Roman font in accordance with Local Rule 5.1.

/s/ Shane Nichols

A. Shane Nichols